

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

WILLIAM J. CHAFFIN JR.
SEMORI WILSON
DOMIN GUERRERO-GUERRERO
DEXTER ALLEN
GEORGE DAUBE
RICHARD LASSIC
CHALFONTE DEMERY
DAMIEN GIBSON
PETER HAWKINS
MARQUIS BAILEY
TOMARRIO BLACKBURN
ANITRA DUES
BRANDON HARRISON
MARK JACKSON
KEITH THOMAS
HERBERT BALLARD
NYGEL SAUNDERS

Criminal No. 15-256

[UNDER SEAL]

(21 U.S.C. §§ 846, 841(a)(1),
841(b)(1)(B)(ii), and
841(b)(1)(C), and 18 U.S.C. §
922(g)(1))

INDICTMENT

COUNT ONE

The grand jury charges:

From in or around June 2015, and continuing thereafter
to in and around November 2015, in the Western District of
Pennsylvania, the defendants, WILLIAM J. CHAFFIN JR., SEMORI
WILSON, DOMIN GUERRERO-GUERRERO, DEXTER ALLEN, GEORGE DAUBE,
CHALFONTE DEMERY, RICHARD LASSIC, DAMIEN GIBSON, PETER HAWKINS,
MARQUIS BAILEY, TOMARRAIO BLACKBURN, ANITRA DUES, BRANDON
HARRISON, MARK JACKSON, and KEITH THOMAS, did knowingly,

intentionally and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to possess with intent to distribute and distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1).

Further, the grand jury finds that each of the defendants is individually responsible for the amounts set forth below, as a result of his own conduct and the conduct of other conspirators that was reasonably foreseeable to him:

WILLIAM J. CHAFFIN JR.	5 kilograms or more	21 U.S.C. § 841(b)(1)(A)(iii)
SEMORE WILSON	5 kilograms or more	21 U.S.C. § 841(b)(1)(A)(iii)
DOMIN GUERRERO-GUERRERO	5 kilograms or more	21 U.S.C. § 841(b)(1)(A)(iii)
DEXTER ALLEN	500 grams or more	21 U.S.C. § 841(b)(1)(B)(ii)
GEORGE DAUBE	500 grams or more	21 U.S.C. § 841(b)(1)(B)(ii)
RICHARD LASSIC	500 grams or more	21 U.S.C. § 841(b)(1)(B)(ii)
CHALFONTE DEMERY	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
DAMIEN GIBSON	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
PETER HAWKINS	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
MARQUIS BAILEY	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
TOMARRIO BLACKBURN	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
ANITRA DUES	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
BRANDON HARRISON	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)

MARK JACKSON	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)
KEITH THOMAS	Less than 500 grams	21 U.S.C. § 841(b)(1)(C)

All in violation of Title 21, United States Code,
Section 846, and Title 18, United States Code, Section 2.

COUNT TWO

The grand jury further charges:

On or about October 6, 2015, in the Western District of Pennsylvania, the defendants, WILLIAM J. CHAFFIN JR. and RICHARD LASSIC, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

The grand jury further charges:

On or about October 7, 2015, in the Western District of Pennsylvania, the defendants, WILLIAM J. CHAFFIN JR. and HERBERT BALLARD, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

The grand jury further charges:

On or about November 3, 2015, in the Western District of Pennsylvania, the defendant, WILLIAM J. CHAFFIN JR., did knowingly, intentionally and unlawfully possess with intent to distribute and distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

The grand jury further charges:

On or about November 3, 2015, in the Western District of Pennsylvania, the defendant, WILLIAM J. CHAFFIN JR., after having been convicted on or about January 4, 1996, at Docket Number CP-02-CR-0009749-1995 of 1995 in the Court of Common Pleas, County of Allegheny, Criminal Division, Commonwealth of Pennsylvania, of the crimes of aggravated assault and distribution and/or possession with intent to distribute a controlled substance, which are crimes punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce firearms and ammunition, namely: a Taurus .38 Special revolver bearing serial number WB78628; a Rohm .22 caliber revolver bearing serial number 1049365; a box of 40 rounds of 9mm Magtech Ammunition; a Heritage Rough Rider revolver, .22 caliber LR, bearing serial number HR10141; sixty (60) rounds of Remington .22 caliber ammunition; and a Ruger rifle, model 10/22 Carbine, bearing serial number 117-80380.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

The grand jury further charges:

On or about November 3, 2015, in the Western District of Pennsylvania, the defendant, KEITH THOMAS, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

The grand jury further charges:

On or about November 3, 2015, in the Western District of Pennsylvania, the defendants, SEMORI WILSON and NYGEL SAUNDERS, did knowingly, intentionally and unlawfully possess with intent to distribute and distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

FORFEITURE ALLEGATION

1. The Grand Jury re-alleges and incorporates by reference the allegations contained in Counts One through Seven of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. As a result of the commission of the violations of Title 18, United States Code, Section 922(g)(1), charged in Count Five, the following firearms and ammunition, which were involved in the commission of these offenses, are subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1):

- a. a Taurus .38 Special revolver bearing serial number WB78628;
- b. a Rohm .22 caliber revolver bearing serial number 1049365;
- c. a box of forty (40) rounds of 9mm Magtech ammunition;
- d. a Heritage Rough Riders revolver, .22 caliber LR, bearing serial number HR10141;
- e. sixty (60) rounds of Remington .22 caliber ammunition;
- f. A Ruger rifle, model 10/22 Carbine, bearing serial number 117-80380.

3. The United States hereby gives notice to the defendants charged in Counts One through Seven that, upon their conviction of any such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including but not limited to, the following:

a. A 2006 Land Rover Range Rover Sport 4WD SUV bearing VIN: SALSF25496A962954, registered to WILLIAM J. CHAFFIN JR.;

b. A 2008 Mercedes Benz E-350 Sedan bearing VIN: WDBUF87X68B307141, registered to WILLIAM J. CHAFFIN JR. and ANITRA DUES;

c. A 2005 Dodge Magnum V-6 SW bearing VIN: 2D4GZ48V75H543010, registered to WILLIAM J. CHAFFIN;

d. A 2009 Harley Davidson Motorcycle bearing VIN: 1HD1FR4109Y693689, registered to WILLIAM J. CHAFFIN;

e. A 2014 Harley Davidson FLHX Street Glide Motorcycle bearing VIN: 1HD1KBM11EB683625, registered to GEORGE

R. DAUBE;

f. A 2006 Cadillac DTS 4DR Sedan bearing VIN:
1G6KD57Y86U117691, registered to HERBERT L. BALLARD;

g. A 2010 Lexus ES350 4DR Sedan bearing VIN:
JTHBK1EG8A2395953, registered to PETER LAMONTE HAWKINS;

h. A 2007 Infiniti FX35 AWD SUV bearing VIN:
JNRAS08W87X205817, registered to PETER LAMONTE HAWKINS;

i. A 2004 Nissan Maxima SE 4D bearing VIN:
1N4BA41E44C830949, registered to SEMORI R. WILSON;

j. A 2006 Subaru B9 Tribeca 7-passenger SUV bearing
VIN: 4S4WX85C464417173, registered to RAMONA R. REEVES;

k. A 2005 Dodge Charger SRT V8 4DR Sedan bearing
VIN: B3LA73W66H369812, registered to LAUREN E. VERES;

l. a Glock model 23, .40 caliber pistol with S/N
VCG706, seized from 177 ½ S. Mt. Vernon Street in Uniontown, PA,
on or about November 3, 2015;

m. a box of Hornady .380 auto ammunition, seized
from 230 Wilson Avenue in Uniontown, PA , on or about November
3, 2015;

n. a Smith and Wesson Bodyguard pistol, .380
caliber, bearing serial number KBB9279, seized from 230 Wilson

Avenue in Uniontown, PA , on or about November 3, 2015;

o. \$10,067 in United States Currency, eized from 230 Wilson Avenue in Uniontown, PA , on or about November 3, 2015.

4. If, through any act or omission by the defendants the property described in paragraphs 2(a) through 2(f) and 3(a) through 3(o) above (hereinafter the "Subject Property"):

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value;
or
- e. Has been commingled with other property which cannot be subdivided without difficulty,

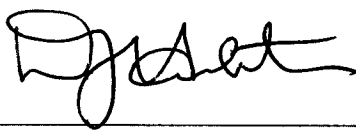
the United States intends to seek forfeiture of any other property of the defendants up to the value of the forfeitable property above in these forfeiture allegations pursuant to Title 18, United States Code, Section 924(d); Title 28, United States

Code, Section 2461(c); and Title 21, United States Code, Section
853(p).

A True Bill,



FOREPERSON



DAVID J. HICKTON
United States Attorney
PA ID No. 34524